

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

RITA FOSTER

PLAINTIFF,

V.

**JOE A. LEE, JAMES PARKER,
LEON FRAZIER, AND
ALABAMA STATE UNIVERSITY,**

DEFENDANTS.

C.A.N.: 2:07-CV-00247-MHT

REPORT OF PARTIES PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on May 7, 2007 and was attended by:

- a. Thomas C. Tankersley for Plaintiff Rita Foster;
- b. Kenneth L. Thomas and Ramadanah M. Salaam-Jones for Defendants
Alabama State University and Dr. Joe A. Lee
- c. Solomon S. Seay, Jr. for Defendant Leon Frazier
- d. James Anderson for Defendant Willie James Parker

2. **Pre-Discovery disclosures:** The Parties will exchange pre-discovery disclosures by May 31, 2007 as required by Fed.R.Civ.P. 26(a)(1).

3. **Discovery Plan:** The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects:

- a. All claims asserted by the Plaintiff.
- b. All defenses asserted by the Defendants.
- c. Any and all persons having knowledge, directly or indirectly, regarding the claims and defenses asserted in this lawsuit.

- d. All discovery commenced in time to be completed by February 1, 2008.

- e. Maximum of 30 interrogatories from each Defendant and 30 from the Plaintiff.

[Responses due in accordance with the Federal Rules of Civil Procedure.]

- f. Maximum of 30 requests for admissions by each party to any party. [Responses due in accordance with the Federal Rules of Civil Procedure.]

- g. Maximum of 10 depositions by Plaintiff and 10 by each Defendant. [Each deposition limited to maximum of eight hours unless extended by agreement of the parties.]

- 4. Other items:

- a. The parties do not request a conference with the Court before entry of the Scheduling Order.

- b. Pleadings may be amended without leave of the Court through June 15, 2007.

- c. Unless modified by stipulation of the parties, the disclosure of expert witnesses - including in a complete report under Fed.R.Civ.P. (26)(2)(b) from any specially retained or employed expert are due:

- i. From the Plaintiff: 90 days prior to trial

- ii. From the Defendants: 60 days prior to trial

- d. Pre-trial conferences: This case will be ready for pretrial conference in February of 2008.

- e. All potentially dispositive motions should be filed by December 31, 2007.

f. Final list of trial witnesses and exhibits under Fed.R.Civ.P. 26(a)(3)
must be served and filed.

i. By the Plaintiff: 30 days prior to trial

ii. By the Defendants: 30 days prior to trial

Objections are to be filed within 14 days after receipt of final lists.

g. Trial: This case will be ready for trial during the March 31, 2008 trial term.

Trial is expected to last 3-4 day(s).

Respectfully Submitted,

/s/ Ramadanah M. Salaam-Jones

KENNETH L. THOMAS

RAMADANAH M. SALAAM-JONES

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University and President Joe A. Lee*

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/s/ James H. Anderson
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